

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS - CENTRAL DIVISION**

IN RE:

CLARENCE MITCHELL REID, A/K/A
CLARENCE M. REID,
Debtor

Case No. 11-31802 - HJB
Chapter 13

**OBJECTION OF WELLS FARGO BANK, N.A.
TO CONFIRMATION OF CHAPTER 13 PLAN**

Now comes Wells Fargo Bank, N.A., formerly known as Wachovia Mortgage, FSB, f/k/a World Savings Bank, FSB (the “Lender”), and hereby objects to the confirmation of the Chapter 13 Plan filed by Clarence Mitchell Reid, a/k/a Clarence M. Reid (the “Debtor”) on or about October 27, 2011.

In support of its Objection, the Lender states as follows:

1. The Lender is a lending organization, with an address of 4101 Wiseman Boulevard, San Antonio, TX 78251.
2. Upon information and belief, the Debtor is a resident of Springfield, MA. The above case was commenced on October 3, 2011, by the filing of a petition for relief pursuant to Chapter 13 of Title 11 of the United States Code.
3. The Debtor and Avril E. Reid (the “CoDebtor”) are the owners of that certain real estate and improvements located at 37 Waldorf Street, Springfield, Massachusetts (the “Premises”).
4. The Lender is the holder of a mortgage (the “Mortgage”) on 37 Waldorf Street, Springfield, Massachusetts, granted by the Debtor and the CoDebtor to the Lender dated January 20, 2006, on the Premises, securing a promissory note granted by the Debtor (the “Note”) dated January 20, 2006, in the original principal amount of \$120,000.00. The Mortgage is recorded with the Hampden County Registry of Deeds, in Book 15654 at Page 483.

5. As of October 3, 2011, the amount of prepetition arrearage owed to the Lender was \$1,931.44, as identified in the Lender's Proof of Claim filed with the Court on or about November 2, 2011.

6. On October 27, 2011 the Debtor filed his Chapter 13 Plan (the "Plan").

7. The Debtor does not make provision for payment of the Lender's prepetition arrearage in the Plan.

8. The Lender objects to confirmation of the Plan as it does not include the full amount of the prepetition arrearage owed to the Lender.

9. The Lender has incurred fees and costs in the amount of \$400.00 in the preparation and filing of this Objection to Confirmation of Chapter 13 Plan, which it seeks to assess to the Debtor's account as well as additional amounts that may accrue on any hearing on same.

WHEREFORE, the Lender hereby requests that confirmation of the Debtor's Chapter 13 Plan be denied.

WELLS FARGO BANK, N.A.

By its Attorneys,

PARTRIDGE SNOW & HAHN LLP

/s/ Charles A. Lovell

Charles A. Lovell (BBO#556064)
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(401)681-1900/FAX(401)681-1910
cal@psh.com

Dated: November 8, 2011

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of November, 2011, I electronically filed an Objection to Confirmation of Chapter 13 Plan with the Clerk of the Bankruptcy Court using the CM/ECF System. The following participants have received notice electronically:

Richard King, Esquire, U.S. Trustee
Denise M. Pappalardo, Esquire, Trustee
Richard S. Ravosa, Esquire, Counsel for Debtor

and I hereby certify that a copy of the Objection to Confirmation of Chapter 13 Plan was served by regular, first class mail, to the following interested parties as set forth below:

Clarence Mitchell Reid, a/k/a
Clarence M. Reid
37 Waldorf Street
Springfield, MA 01109

Avril E. Reid
37 Waldorf Street
Springfield, MA 01109

/s/ Charles A. Lovell

Charles A. Lovell

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